

1 STEVEN A. GIBSON
2 Nevada Bar No. 6656
sgibson@dickinsonwright.com
3 JONATHAN M. A. SALLS
Nevada Bar No. 12085
jsalls@dickinsonwright.com

4
5 **DICKINSON WRIGHT PLLC**

6 City Center West
7 7201 West Lake Mead Boulevard, Suite 503
Las Vegas, Nevada 89128
Telephone 702.541.7888
Facsimile 702.541.7899

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9 *Attorneys for Plaintiffs*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 STEVO DESIGN, INC., a Florida corporation;
13 STEVEN BUDIN, an individual; and ALAN
ROLLI, an individual,

Case No.: 2:11-cv-00304-LRH-CWH

14 Plaintiff,

**REQUEST TO ENTER DEFAULT OF
BRIAN DANIELE**

15 v.

16 SBR MARKETING LTD., a foreign
corporation; and BRIAN DANIELE, an
individual,

17 Defendant.

18
19 Plaintiffs, Stevo Design, Inc., Steven Budin, and Alan Rolli (collectively “Plaintiffs”), by
20 and through their counsel, Dickinson Wright PLLC, hereby request that the Clerk of the above-
21 entitled Court enter a Default in this matter against Defendant Brian Daniele (“Mr. Daniele”)
22 pursuant to the Federal Rules of Civil Procedure 55.

23 Mr. Daniele filed Defendant Brian Daniele’s Answer to First Amended Complaint on
24 May 2, 2011. (Doc. No. 12.) On May 16, 2011, the Court ordered Mr. Daniele to file Mr.
25 Daniele’s Certificate as to Interested Parties by May 26, 2011 (Doc. No. 14), which Mr. Daniele
26 failed to do. On June 10, 2011, the Court ordered Mr. Daniele to file Mr. Daniele’s Certificate as
27 to Interested Parties by June 20, 2011 (Doc. No. 15), which Mr. Daniele failed to do.

1 On June 30, 2011, Mr. Daniele participated in a conference call to discuss all the issues
2 addressed in Fed.R.Civ.P. 26(f). On that same day, Plaintiffs sent the Discovery Plan and
3 Scheduling Order to Mr. Daniele to seek Mr. Daniele's agreement to the Discovery Plan and
4 Scheduling Order. Mr. Daniele failed to respond. Mr. Daniele failed to provide initial
5 disclosures pursuant to Fed.R.Civ.P. 26(a) and the Discovery Plan and Scheduling Order.
6 Plaintiffs have not received any communication from Mr. Daniele since June 30, 2011. At a
7 minimum, Mr. Daniele has failed to defend himself since June 30, 2011. The above facts are set
8 forth in the declaration of Jonathan M. A. Salls, Esq. attached hereto as Exhibit 1.

9 Dated this 23rd day of December, 2011.

10
11 DICKINSON WRIGHT PLLC

12 By /s/ Jonathan M. A. Salls

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15 JONATHAN M. A. SALLS
16 Nevada Bar No. 12085
17 City Center West
18 7201 West Lake Mead Boulevard, Suite 503
19 Las Vegas, Nevada 89128

CERTIFICATE OF SERVICE

Pursuant to Local Rule 5 of this Court, I certify that I am an employee of Dickinson Wright PLLC and that on this 23rd day of December, 2011, I caused a correct copy of the foregoing **Request to Enter Default of Brian Daniele** to be served via United States first-class mail to:

Brian Daniele
7002 Braddock Mews Place
Springfield, Virginia 22151
In Proper Person

Pursuant to Local Rule 5 of this Court, I certify that I am an employee of Dickinson Wright PLLC and that on this 23rd day of December, 2011, I caused a correct copy of the foregoing **Request to Enter Default of Brian Daniele** to be served via CM/ECF to:

Gary Jay Kaufman, Esq.
The Kaufman Law Group
1901 Avenue of the Stars, Suite 1010
Los Angeles, California 90067

Chad Bowers, Esq.
Chad A. Bowers, Ltd.
3202 West Charleston Boulevard
Las Vegas, Nevada 89102

Attorneys for Defendant SBR Marketing Ltd.

/s/ Erin L. Wood
An employee of Dickinson Wright PLLC